1 MACDONALD | FERNANDEZ LLP IAIN A. MACDONALD (SBN 051073) 221 Sansome Street, Third Floor San Francisco, CA 94104 3 Telephone: (415) 362-0449 Facsimile: (415) 394-5544 4 Attorneys for Debtor-in-Possession, 5 DUTCHINTS DEVELOPMENT LLC 6 7 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 21-51255-MEH-11 In re 11 DUTCHINTS DEVELOPMENT LLC, Chapter 11 12 **DEBTOR'S NOTICE OF INTENT TO** 13 Debtor in Possession. FILE OPPOSITION TO UNITED STATES TRUSTEE'S MOTION TO 14 APPOINT CHAPTER 11 TRUSTEE 15 UNDER 11 U.S.C. § 1104(a), OR, IN THE ALTERNATIVE, TO CONVERT CASE 16 **TO CHAPTER 7 PURSUANT TO 11** U.S.C. § 1112(b); AND MEMORANDUM 17 OF POINTS AND AUTHORITIES IN SUPPORT AND RESERVATION OF 18 RIGHTS 19 Date: February 10, 2022 20 Time: 10:00 a.m. Place: Via Tele/Videoconference 21 22 23 COMES NOW Dutchints Development LLC and gives notice of its intent to file its 24 opposition to the United States Trustee's Motion to Appoint Chapter 11 Trustee Under 11 U.S. § 25 1104(a), Or, in the Alternative, to Convert Case to Chapter 7 Pursuant to 11 U.S.C. 112(b); and 26 Memorandum of Points and Authorities in Support and Reservation of Rights, filed on January 12, 27 2022 (Dkt. 95), seven (7) days before the schedule hearing (February 3, 2022), pursuant to B.L.R. 28 9014-1(c)(2).

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A motion to convert or appoint a trustee is to seek relief generally, and not against an identified, named entity and thereby opposition to the requested relief shall be filed and served on the initiating party no less than seven (7) days before the actual scheduled hearing date. DATED: January 28, 2022 MACDONALD FERNANDEZ LLP By: /s/ Iain A. Macdonald Iain A. Macdonald, Attorneys for Dutchints Development LLC, Debtor in Possession 

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